

1 SHEILA L. MOHSINI, ESQ (SBN 326635)
2 **MOHSINI LAW**
3 118 E OAK AVE STE B
4 VISALIA, CA 93292
5 PH: (559) 372-7221
6 FAX: (559) 553-8838
7 E-MAIL: SHEILA@MOHSINILAW.COM

8 Attorney for Plaintiff

9 NATALIYA SHTEVNINA, ESQ
10 SHAWNA HARRIS, ESQ
11 **COUNTY OF PLACER**
12 OFFICE OF COUNTY COUNSEL
13 175 FULWEILER AVE
14 AUBURN, CA 95603
15 PH: (530) 889-4055
16 FAX: (530) 889-4069
17 EMAIL: SHARRIS@PLACER.CA.GOV
18 CCL-ESERVICE@PLACER.CA.GOV
19 NSHTEVNINA@PLACER.CA.GOV
20 AANVARI@PLACER.CA.GOV

21 ASHLEY N. REYES, ESQ.
22 NORMAL DONALD MORRISON, IV, ESQ.
23 **CALIFORNIA DEPARTMENT OF JUSTICE**
24 2550 MARIPOSA MALL, ROOM 5090
25 FRESNO, CA 93721
26 PH: (559) 705-2312
27 FAX: (559) 445-5106
28 EMAIL: ASHLEY.REYES@DOJ.CA.GOV
NORMAN.MORRISON@DOJ.CA.GOV
CARRIE.VUE@DOJ.CA.GOV

LEE H. ROISTACHER, ESQ.
KIMBERLY A. SULLIVAN, ESQ.
DEAN, GAZZO, ROISTACHER LLP
440 STEVENS AVE STE 100
SOLANA BEACH, CA
PH: (858) 264-4938
FAX: (858) 492-0486
EMAIL: LROISTACHER@DEANGAZZO.COM
KSULLIVAN@DEANGAZZO.COM
MMACIAS@DEANGAZZO.COM
MKILCREASE@DEANGAZZO.CO

Attorneys for Defendants

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3

4 STACIE MILLER, INDIVIDUALLY AND AS
5 SUCCESSOR IN INTEREST TO, ESTATE OF
6 VINTON MILLER

7 PLAINTIFF,

8 vs.

9 PLACER COUNTY, A MUNICIPAL
10 CORPORATION; CALIFORNIA HIGHWAY
11 PATROL OFFICER CLAYTON GUILLEMIN,
12 INDIVIDUALLY; CALIFORNIA STATE
13 PARKS OFFICER MATTHEW YARBROUGH,
14 INDIVIDUALLY; AND DOE 1 TO 100,
15 INDIVIDUALLY, JOINT, AND SEVERALLY

16 DEFENDANTS(S)
17
18
19
20

) Case No.: 2:25-cv-01389-WBS-JDP

) **STIPULATION AND JOINT REQUEST**
) **FOR ORDER EXTENDING INITIAL**
) **CASE MANAGEMENT CONFERENCE;**
) **DECLARATION OF SHEILA L.**
) **MOHSINI; ORDER**

) Honorable Judge: William B. Shubb

16 Plaintiff STACIE MILLER, and Defendants PLACER COUNTY, and PLACER COUNTY
17 SHERIFF'S OFFICE ("County Defendants"), CALIFORNIA HIGHWAY PATROL OFFICER
18 CLAYTON GUILLEMIN ("CHP Officer Clayton Guillemine"), and CALIFORNIA STATE
19 PARKS OFFICER MATTHEW YARBROUGH ("California State Parks Officer Matthew
20 Yarbrough") by and through their counsel, hereby, stipulate, pursuant to Civil Local Rules

21 WHEREAS, Plaintiffs filed a Complaint on May 15, 2025 (ECF No. 1);

22 WHEREAS, on May 16 2025, the Court issued an Initial Case Management Scheduling
23 Order setting an initial case management conference on September 22, 2025 (ECF No. 3);

24 WHEREAS, Defendants filed Motions to Dismiss on June 23, 2025 (ECF No. 19, 21, 22
25 and 31);
26
27
28

1 WHEREAS, the aforementioned Motions were heard on August 18, 2025, on which date
2 counsel for the parties met and conferred regarding a continuance of the initial case management
3 conference due to scheduling conflicts.

4 NOW THEREFORE, the parties hereby STIPULATE as follows:

5 The parties STIPULATE and JOINTLY REQUEST that the Court continue the initial case
6 management conference set for September 22, 2025 at 1:30 P.M to January 26, 2026 at 1:30 P.M.

7 SHEILA L. MOHSINI
8 MOHSINI LAW

9 DATED: 08/24/25

10 /s/ Sheila L. Mohsini
Attorney for Plaintiff

11
12 DATED:

NATALIYA SHTEVNINA, ES
13 COUNTY OF PLACER
OFFICE OF COUNTY COUNSEL

14 /s/

Attorney for Defendants
15 COUNTY OF PLACER

16 DATED:

ASHLEY N. REYES
17 CALIFORNIA DEPARTMENT OF JUSTICE

18 /s/

Attorney for Defendant
19 MATTHEW YARBROUGH

20 DATED:

KIMBERLY A. SULLIVAN, ESQ.
21 DEAN, GAZZO, ROISTACHER LLP

22 /s/

Attorney for Defendant
23 CLAYTON GUILLEMIN
24
25
26
27
28

DECLARATION OF SHEILA L. MOHSINI

I, Sheila L. Mohsini, declare and state as follows:

1. I am attorney at law and counsel of record for Plaintiff STACIE MILLER (“Plaintiff”)

2. I submit this declaration in support of the Stipulation and Joint Request to extend the initial case management conference.

3. On September 22, 2025, counsel for Plaintiff will be in trial.

4. The parties therefore propose to move the date of the initial case management conference from September 22, 2025 to January 26, 2026, the proposed date is the next date that counsel for Plaintiff and counsel for Defendants are available for the Court’s Monday case management conference schedule.

5. While this date change pushes the initial case management conference back by five weeks, it will not delay progress in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: August 28, 2025


/s/

SHEILA L. MOHSINI
Attorney for Plaintiff

ORDER

PURSUANT TO STIPULATION, and good cause appearing, IT IS SO ORDERED that the parties' initial case management conference set for September 22, 2025 at 1:30 P,M shall be continued to **January 26, 2026 at 1:30 P.M.**

Dated: September 4, 2025



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE